

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

Nicholas Zemlick,

Plaintiff,

v.

Sheriff Brad Burkhart (in his official and
individual capacities), et al.

Defendants.

Case No. 1:22-cv-02319-TWP-MJD

**Unopposed Motion for
Extension of Time to
Disclose Expert
Witnesses**

Comes now Plaintiff, Nicholas Zemlick, by counsel, and for his unopposed motion for extension of time to disclose expert witnesses would state as follows:

1) Plaintiff is currently required to disclose expert witnesses by December 4, 2023, and Defendants are currently required to disclose expert witnesses by January 5, 2024.

2) Plaintiff respectfully requests those dates be extended by forty-five (45) days.

3) Defendants do not object to this motion.

4) In light of the extension of expert deadlines, the only deadlines impacted would be that of expert witness discovery which is set to close March 4, 2024, and motions to limit or preclude expert testimony, which are due April 1, 2024.

5) Extending these forty-five (45) days as well would resolve any issue with the extension and wouldn't cause undue delay in this action with dispositive motions expected to be filed soon that will likely be pending still through the extensions.

6) Thus, the extended dates would be as follows:

Plaintiff's Disclosure: January 18, 2024;

Defendants' Disclosure: February 19, 2024;

Expert Discovery: April 18, 2024; and

Expert Preclusion Motion: May 16, 2024.

Wherefore Plaintiff, by counsel, respectfully requests the Court extend the expert disclosure deadlines and connected deadlines as set forth above, and for all other relief just and proper in the premises.

Respectfully submitted,

WALDRON TATE BOWEN LAND LLC

/s/ *Brandon E. Tate*

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Certificate of Service

I certify that on November 29, 2023, I electronically filed the foregoing document I also certify that on November 29, 2023 the foregoing document was served upon all counsel of record via E-Filing E-Service.

/s/ *Brandon E. Tate*

Brandon E. Tate, Atty. No. 35281-49